

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DESIREE HOLLIS,)	
)	Case No. 21 C 1956
Plaintiff,)	
)	Judge: Hon. Thomas Durkin
v.)	
)	Mag. Judge: Hon. Jeffrey Cole
THE CITY OF CHICAGO and CHICAGO)	
POLICE OFFICER IOAN BOERIU)	
(#UNKNOWN),)	
)	
Defendants.)	

**DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER
OR OTHERWISE PLEAD**

Defendant City of Chicago, by and through one of its attorneys, Emily R. Bammel, Assistant Corporation Counsel, respectfully requests, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), that this Court extend the time for all defendants to answer or otherwise plead to Plaintiff’s First Amended Complaint through and including July 6, 2021. In support of this motion, the Defendants state as follows:

1. On April 12, 2021, Plaintiff filed their initial Complaint against the City of Chicago and a Chicago Police Department Officer. *See* ECF Dkt. #1. Plaintiff’s allegations arise from an incident that occurred on or about April 13, 2019. *Id.*
2. Upon receipt of information that the named individual defendant could not be identified by the Chicago Police Department, the undersigned counsel contacted Plaintiff’s attorney via email correspondence on May 20, 2021, to relay this information. In response, Plaintiff’s attorney indicated their intention to file an Amended Complaint with the proper defendant’s identification, to which the Defendant City did not object.

3. On May 21, 2021, Plaintiff filed the instant First Amended Complaint. *See* ECF Dkt. #10. Plaintiff's counsel sent the undersigned counsel the filed Amended Complaint the same date, making the Defendant City's Answer due June 4, 2021.
4. Summons was not issued until June 1, 2021. *See* ECF Dkt. #10. The undersigned counsel anticipates representing the other individually named defendant, upon completion and confirmation of service.
5. Allowing an extension for all named Defendants to Answer will prevent multiple, separate responsive filings.
6. This is the first request for an extension by the Defendant. An extension through and including July 6, 2021 should be sufficient time to complete service, obtain consent for representation, and for all named Defendants to provide a comprehensive and appropriate responsive pleading to Plaintiff's Complaint, and would not prejudice Plaintiff.
7. On June 3, 2021, the undersigned counsel for Defendant City contacted Plaintiff's counsel via email correspondence regarding the contents of this motion, which they responded they had no objection to an extension for all named defendants to answer or otherwise plead, up to and including July 6, 2021.

WHEREFORE, the Defendant asks that this Court grant all Defendants an extension of time to answer or otherwise plead to Plaintiff's amended complaint through and including July 6, 2021, and grant any other relief this Court deems appropriate and just.

Respectfully submitted,

By: /s/ Emily R. Bammel

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Counsel for Defendant Officers

CERTIFICATE OF SERVICE

I, Emily R. Bammel, an attorney, hereby certify that I served the above **DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD** by causing it to be delivered by the Court's CM/ECF system, which will send notification of such filing and a file stamped copy to all counsel of record, this 4th day of June, 2021. This motion is not noticed for presentment pursuant to the United States District Court for the Northern District of Illinois Ninth Amended General Order 20-0012 and this Court's standing orders.

/s/ Emily R. Bammel
EMILY R. BAMMEL

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